

PHILLIP A. TALBERT  
Acting United States Attorney  
ALYSON A. BERG  
Assistant United States Attorney  
2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
APPROXIMATELY \$141,513.00 IN U.S.  
CURRENCY,  
Defendant.

CASE NO. 1:21-MC-00069-AWI-BAM

STIPULATION AND ORDER FURTHER  
EXTENDING TIME FOR FILING A COMPLAINT  
FOR FORFEITURE AND/OR TO OBTAIN AN  
INDICTMENT ALLEGING FORFEITURE

The United States of America and potential claimant Sergiy Krystafovych (“potential claimant”), by and through their counsel, do agree and STIPULATE as follows:

1. On or about May 5, 2021, potential claimant filed a claim in the administrative forfeiture proceeding with the U.S. Customs and Border Protection with respect to the above-captioned currency (hereafter “defendant currency”), which was seized on August 25, 2020.

2. The U.S. Customs and Border Protection has sent the written notice of intent to forfeit required by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than the potential claimant has filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days after a claim has been filed in the administrative

1 forfeiture proceedings, unless the court extends the deadline for good cause shown or by agreement of  
2 the parties. That deadline was August 2, 2021.

3       4. By Stipulation and Order filed August 2, 2021, the parties stipulated to extend to October  
4 31, 2021, the time in which the United States is required to file a civil complaint for forfeiture against  
5 the defendant property and/or to obtain an indictment alleging that the defendant property is subject to  
6 forfeiture.

7       5. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
8 to December 30, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
9 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is  
10 subject to forfeiture.

11       6. Accordingly, the parties agree that the deadline by which the United States shall be  
12 required to file a complaint for forfeiture against the defendant property and/or to obtain an indictment  
13 alleging that the defendant property is subject to forfeiture shall be extended to December 30, 2021.

14       Dated: October 22, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

19       Dated: October 22, 2021

16       By: /s/ Alyson A. Berg  
17                    ALYSON A. BERG  
18                    Assistant United States Attorney

22       IT IS SO ORDERED.

23       Dated: October 25, 2021

20       By: /s/ Jakrun Sodhi  
21                    JAKRUN SODHI  
22                    Attorney for Sergiy Krystafovych  
23                    (Original signature retained by attorney)

24                      
25                    SENIOR DISTRICT JUDGE